

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA, ATLANTA DIVISION**

BLUE CROSS BLUE SHIELD)
HEALTHCARE PLAN OF)
GEORGIA, INC.,)
Plaintiff,)
v.) Case No. 1:25-cv-02919-TWT
HALOMD, INC., *et al.*,)
Defendants.)

**DEFENDANT HALOMD, INC.'S UNOPPOSED
MOTION FOR ENLARGEMENT OF PAGE LIMITATIONS**

Defendant HALOMD, INC. (“HaloMD”) respectfully moves the Court for an enlargement of the default 25-page limit for motions under LR 7.1(D), NDGa. Specifically, HaloMD requests leave to file a 45-page motion to dismiss, exclusive of caption, tables of contents and authorities, signature block, and certificate of service.

The Court has express authority to deviate from its Civil Local Rules where they “would not be feasible or would work an injustice.” LR 1.1(B). Here, Plaintiff BLUE CROSS BLUE SHIELD HEALTHCARE PLAN OF GEORGIA, INC.’s (“BCBSGA”) Complaint asserts 11 claims for relief in its 223 paragraph Complaint and presents complex questions of fact and law. As a result, although HaloMD intends to frame its position in its forthcoming motion to dismiss as precisely as possible, 25 pages is respectfully inadequate for

HaloMD to fully brief the Court on why all 11 of BCBSGA's claims against HaloMD should be dismissed with prejudice. Imposing rigid page limitations at this early stage would work an injustice by forcing HaloMD to submit truncated and likely incomplete arguments.

HaloMD's undersigned counsel conferred with counsel for BCBSGA via email on July 17 and 18, 2025, concerning the relief sought herein, who represented that BCBSGA does not oppose the relief sought herein. Accordingly, the Court should grant this motion and permit HaloMD to file a 45-page motion to dismiss, exclusive of caption, tables of contents and authorities, signature block, and certificate of service.

Dated the 21st day of July 2025.

Respectfully submitted,

POLSINELLI PC

/s/ Kurt R. Erskine
Kurt R. Erskine
Ga. Bar No. 249953
1201 West Peachtree Street NW, Suite 1100
Atlanta, Georgia 30309
(404) 253-6033
(404) 795-9189 (f)
kerskine@polsinelli.com

Counsel for Defendant HaloMD, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2025, I electronically filed the foregoing with the Court's E-Filing, which will send notification of such filing to all counsel of record.

/s/ Kurt R. Erskine
Kurt R. Erskine